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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13 v.
14 CAMRON MEADOWS,
15 Defendant.

Case No. 2:22-mj-00489-EJY

**JOINT STATUS REPORT AND
STIPULATION**

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
18 Frierson, United States Attorney, and Randolph J. St. Clair, Assistant United
19 States Attorney, counsel for the United States of America, and Rene L.
20 Valladares, Federal Public Defender, and Joy Chen, Assistant Federal Public
21 Defender, counsel for Camron Meadows, that defendant's guilty plea to
22 Operating a Motor Vehicle While Under the Influence of Alcohol, 36 C.F.R. §
23 4.23(a)(1), be withdrawn; that the government be permitted to amend the charge
24 to Reckless Driving, 36 C.F.R. § 4.2(b), N.R.S. § 484.653(1); that the defendant's
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1 original guilty plea and sentence be applied to the amended charge; and that the
2 defendant's unsupervised probation be terminated at this time.

3 This Stipulation is entered into for the following reasons:

4 1. On October 25, 2023, the parties appeared before this Court for
5 change of plea and sentencing. ECF No. 10. At that appearance, the defendant
6 pleaded guilty to Operating a Motor Vehicle While Under the Influence of
7 Alcohol, a violation of 36 C.F.R. §4.23(a)(1).

8 2. Pursuant to the parties' agreement, the defendant agreed to be
9 sentenced to unsupervised probation for one year, pay a \$500 fine and \$10
10 assessment fee, and complete a DUI course, Victim Impact Panel, and 16-hour
11 online alcohol awareness course. The defendant also agreed not to violate any
12 local, state, or federal laws. The parties agreed that if the defendant successfully
13 completed his obligations within the first six months of his unsupervised
14 probation, the parties would jointly move to allow the defendant to withdraw his
15 guilty plea to Operating a Motor Vehicle While Under the Influence of Alcohol,
16 the government would move to amend the charge to Reckless Driving, a violation
17 of 36 C.F.R. § 4.2(b), N.R.S. § 484.653(1), and the defendant's guilty plea and
18 sentence would be automatically applied to the new charge. This Court ordered
19 the parties to file a joint status report with the Court once the defendant
20 completed all of the required conditions.

21 3. As of the filing of this stipulation, the defendant has completed all of
22 the conditions set forth in the parties' agreement. Defense counsel has provided
23 proof of completion to the government. The defendant also has not violated any
24 local, state, or federal laws.

1 4. The parties therefore request that this Court permit the defendant
2 to automatically withdraw his guilty plea to Operating a Motor Vehicle While
3 Under the Influence of Alcohol, 36 C.F.R. § 4.23(a)(1); that the government be
4 permitted to amend the charge to Reckless Driving, 36 C.F.R. § 4.2(b), N.R.S. §
5 484.653(1); and that the defendant's original guilty plea and sentence be applied
6 to the amended charge.

7 5. The parties also respectfully request that the defendant's
8 unsupervised probation be terminated at this time.

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11 DATED this 13th day of May, 2024.

12
13 RENE L. VALLADARES
14 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

15 By /s/ Joy Chen
16 JOY CHEN
17 Assistant Federal Public Defender
 Attorney for Camron Meadows

 By /s/ Randolph J. St. Clair
 RANDOLPH J. ST. CLAIR
 Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CAMRON MEADOWS,

Defendant.

Case No. 2:22-mj-00489-EJY

FINDINGS OF FACT AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. On October 25, 2023, the parties appeared before this Court for change of plea and sentencing. ECF No. 10. At that appearance, the defendant pleaded guilty to Operating a Motor Vehicle While Under the Influence of Alcohol, a violation of 36 C.F.R. §4.23(a)(1).

2. Pursuant to the parties' agreement, the defendant agreed to be sentenced to unsupervised probation for one year, pay an \$500 fine and \$10 assessment fee, and complete a DUI course, Victim Impact Panel, and 16-hour online alcohol awareness course. The defendant also agreed not to violate any local, state, or federal laws. The parties agreed that if the defendant successfully completed his obligations within the first six months of his unsupervised probation, the parties would jointly move to allow the defendant to withdraw his guilty plea to Operating a Motor Vehicle While Under the Influence of Alcohol, the government would move to amend the charge to Reckless Driving, a violation

1 of 36 C.F.R. § 4.2(b), N.R.S. § 484.653(1), and the defendant's guilty plea and
2 sentence would be automatically applied to the new charge. This Court ordered
3 the parties to file a joint status report with the Court once the defendant
4 completed all of the required conditions.

5 3. As of the filing of this stipulation, the defendant has completed all of
6 the conditions set forth in the parties' agreement. Defense counsel has provided
7 proof of completion to the government. The defendant also has not violated any
8 local, state, or federal laws.

9 4. The parties therefore request that this Court permit the defendant
10 to automatically withdraw his guilty plea to Operating a Motor Vehicle While
11 Under the Influence of Alcohol, 36 C.F.R. § 4.23(a)(1); that the government be
12 permitted to amend the charge to Reckless Driving, 36 C.F.R. § 4.2(b), N.R.S.
13 § 484.653(1); and that the defendant's original guilty plea and sentence be
14 applied to the amended charge.

15 5. The parties also request that the defendant's unsupervised
16 probation be terminated at this time.
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ORDER

IT IS THEREFORE ORDERED that defendant's guilty plea to Operating a Motor Vehicle While Under the Influence of Alcohol, 36 C.F.R. § 4.23(a)(1), is withdrawn, and the count is amended to Reckless Driving, 36 C.F.R. § 4.2(b), N.R.S. § 484.653(1).

IT IS FURTHER ORDERED that the defendant's original guilty plea and sentence is applied to the amended charge.

IT IS FURTHER ORDERED that defendant's unsupervised probation is terminated.

DATED this 13th day of May, 2024.


UNITED STATES MAGISTRATE JUDGE